

THE HONORABLE RONALD B. LEIGHTON

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ARKEMA, INC., et al.

Plaintiffs,

v.

ASARCO, INC., et al.

Defendants.

Case No. C5-5087 RBL

DEFENDANT WEYERHAEUSER
COMPANY'S EXHIBIT LIST

WEYERHAEUSER'S EXHIBIT LIST

Pursuant to the amended Case Management Order, Weyerhaeuser submits the following exhibit list.

EXHIBIT LIST

Please see Attachment A. In addition, Weyerhaeuser notes the following. First, Exhibits A-526 through A-567 are believed to be common exhibits to both Plaintiffs' and Weyerhaeuser's lists, and pending final agreement among the parties, would be listed on Plaintiffs' exhibit list only and withdrawn from Weyerhaeuser's list. Second, by listing certain exhibits such as A-551 and A-559, Weyerhaeuser does not waive its objections to these reports and their exhibits, tables, and figures on the basis that these documents were produced late – on April 16, 2007 (only one week ago) – and Weyerhaeuser has not had an opportunity to digest or conduct discovery on them.

DATED this 23rd day of April, 2007.

Respectfully submitted,

/s/ Mark D. Coldiron

Mark D. Coldiron - OBA. #001774

Keith J. Klein - OBA #018285

Ryan, Whaley & Coldiron, P.C.

900 Robinson Renaissance

119 N. Robinson

Oklahoma City, OK 73102

Telephone: (405) 239-6040

Fax: (405) 239-6766

E-mail: mcoldiron@ryanwhaley.com

kklein@ryanwhaley.com

- and -

Kimberly A. Hughes – WSBA #18069

Weyerhaeuser Company Law Department – CH

1J28

PO Box 9777
Federal Way, Washington 98063-9777
Telephone: (253) 924-3440
Fax.: (253) 924-6347
E-mail: kim.hughes@weyerhaeuser.com

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Dianne K. Conway: dconway@gth-law.com
Counsel for Echo Lumber Company

Bradley B. Jones: bjones@gth-law.com.
Counsel for Echo Lumber Company

Clark J. Davis: clark@drj-law.com
Counsel for Donald E. Oline

John R. Spencer: jspencer@spencer-lawfirm.com
Counsel for Petroleum Reclaiming Service, Inc.

David N. Land: dland@spencer-lawfirm.com; asmith@spencer-lawfirm.com,
skennedy@spencer-lawfirm.com
Counsel for Petroleum Reclaiming Service, Inc.

John D. McCarthy: jay.mccarthy@hro.com
Counsel for Arkema, Inc.

Kimberly A. Seeley: kseely@goodsteinlaw.com
Counsel for Asarco

Stephen T. Parkinson: sparkinson@groffmurphy.com
Counsel for Arkema, Inc.

Mark M. Myers: mmyers@wkg.com
Counsel for General Metals of Tacoma, Inc.

Timothy L. Ashcraft: tashcraft@wkg.com
Counsel for General Metals of Tacoma, Inc.

Kenneth W. Lund: kenneth.lund@hro.com
Counsel for Arkema, Inc.

Leslie Reade Schenck: lschenck@gsblaw.com

1 *Counsel for Spencer Environmental, Inc.*

2 Marilee J. Allen: marilee.allan@bingham.com
3 *Sygen International, PLC*

4 Tod A. Gold: tgold@sjzlaw.com
5 *Portac, Inc.*

6 Gregory A. Jacoby: gaj@mcgavick.com, kmt@mcgavick.com
7 *Sygen International, PLC*

8 William F. Joyce: wjoyce@sjzlaw.com, mzobrist@sjlaw.com
9 *Portac, Inc.*

10 William D. Kissinger: william.kissinger@bingham.com
11 *Sygen International, PLC*

12 David Nelson Bruce: dbruce@jetcitylaw.com
13 *Counsel for JCI Jones Chemicals, Inc.*

14 /s/Vicki Campbell

15 Vicki Campbell, Paralegal to
16 Mark D. Coldiron

ATTACHMENT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-1	07/14/06	Resume for Teri Floyd, PhD	
A-2	07/00/06	Volume of Wood in Recent Deposits Dredged (Table 6.3 to Floyd 7/14/06)	EX003294
A-3	07/00/06	Calculated Volumes of Wood Debris and Contaminated Sediment in the UTB (Table 6.4 to Floyd 7/14/06 Expert Report; Floyd Dep. Ex. 25; Recker 3/9/07 Dep. Ex 5)	EX003295-003296
A-4	07/00/06	Historical Progression of the Hylebos Waterway Construction (Figure 1.1 to Floyd 7/14/06 Expert Report)	EX003298
A-5	07/00/06	Geologic Cross Section of the Neck (Figure 1.2 to Floyd 7/14/06 Expert Report)	EX003299
A-6	07/00/06	Geologic Cross Section of the Neck (Figure 1.3 to Floyd 7/14/06 Expert Report)	EX003300
A-7	07/00/06	Commencement Bay Superfund Site (Figure 1.4 to Floyd 7/14/06 Expert Report)	EX003301
A-8	07/00/06	Hylebos Operable Unit and Investigation Segments 1 & 2 (Figure 1.5 to Floyd 7/14/06 Expert Report)	EX003302
A-9	07/00/06	Figure – Hylebos Wood Debris Site (Figure 2.1 to Floyd 7/14/06 Expert Report)	EX003303
A-10	07/00/06	Sample Stations from Key Investigations (1991 to 2001) (Figure 2.2 to Floyd 7/14/06 Expert Report)	EX003304
A-11	07/00/06	Relationship Between Measured TVS and Percent Wood by Volume (Figure 2.3 to Floyd 7/14/06 Expert Report)	EX003305
A-12	07/00/06	HWDS Wood Cleanup Decision Tree (Figure 2.4 to Floyd 7/14/06 Expert Report)	EX003306
A-13	07/00/06	Final Cleanup Areas in the Neck and UTB (Figure 2.5 to Floyd 7/14/06 Expert Report)	EX003307
A-14	07/00/06	Cross-Section Schematic of “Neck” Showing Area from Dunlap Yard to General Metals (Figure 2.6 to Floyd 7/14/06 Expert Report)	EX003308
A-15	07/00/06	ROD SQO Exceedances in Surface Grab Stations (Figure 3.1 to Floyd 7/14/06 Expert Report)	EX003309
A-16	07/00/06	ROD SQO Exceedances in Core Stations (Figure 3.2 to	EX003310

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Floyd 7/14/06 Expert Report)	
A-17	07/00/06	Dredge Areas-UTB and Neck (Figure 5.1 to Floyd 7/14/06 Expert Report)	EX003311
A-18	07/00/06	Type 3 and Type 4 Confirmation Sample Locations (Figure 5.2 to Floyd 7/14/06 Expert Report)	EX003312
A-19	07/00/06	Bathymetry of the Neck (Figure 6.1 to Floyd 7/14/06 Expert Report; Floyd Dep. Ex. 7)	EX003313
A-20	07/00/06	Total Dredge Thickness (Figure 6.2 to Floyd 7/14/06 Expert Report)	EX003314
A-21	07/00/06	Pre-dredge Thickness of Recent Deposits (Figure 6.3 to Floyd 7/14/06 Expert Report)	EX003315
A-22	07/00/06	Thickness of Native Sediment Dredged from the Neck (Figure 6.4 to Floyd 7/14/06 Expert Report)	EX003316
A-23	07/00/06	ROD SQO Exceedances in Core Stations and Total Dredge Thickness (Figure 6.5 to Floyd 7/14/06 Expert Report)	EX003317
A-24	07/00/06	Historical and Current Log Rafting and Transfer Areas (Figure 6.6 to Floyd 7/14/06 Expert Report)	EX003318
A-25	07/00/06	Log Handling in the UTB and Neck Aerials (Figure 6.7 to Floyd 7/14/06 Expert Report)	EX003319
A-26	07/00/06	SQO Exceedances in PSDDA DMMUs (Figure 6.8 to Floyd 7/14/06 Expert Report)	EX003320
A-27	03/07/01	Final Field and Data Report-Kaiser Ditch and Nearshore Investigation, Tacoma Export Facility (Battelle)	WEY0006813-6920
A-28	08/00/01	PowerPoint Presentation-Kaiser Ditch and Near shore Investigation, Tacoma Export Facility (Battelle)	ARC-E00002299-2328
A-29	09/00/92	Results of Sediment Sampling in Support of Outfall Diffuser Project (Reference Boateng & Associates, Inc.)	ARC0055263-55455
A-30	04/23/01	PAH Contributions to the Hylebos Waterway from the Kaiser/Tacoma Waste Streams (Delta Environmental Consultants, Inc.)	WEY0018146-18227
A-31		Bathymetric Surveys of the Hylebos Waterway 1965-present, including plan views of historical sounds, cross-sectional views, and isopach maps; all will be based on existing bathymetric surveys and soundings already shared by both	

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Plaintiffs and Weyerhaeuser. Views may also include chemistry data that has already been shared.	
A-32	01/08/98	Hylebos Waterway Wood Debris Program Draft Final Cleanup Study Work Plan (Floyd & Snider)	FS0024335-383
A-33	08/00/00	Hylebos Waterway Wood Debris Program Cleanup Action Design Report (Floyd & Snider)	Reference Floyd 7/14/06 Rpt
A-34	04/12/01	Construction Documentation, Site Cleanup Action LP Corporation (Floyd Snider McCarthy)	Reference Floyd 7/14/06 Rpt
A-35	05/01/02	Construction Documentation, Site Cleanup Action LP Corporation (Floyd Snider McCarthy)	WEYE000000001- 14
A-36	00/00/74	Geology of the Port of Tacoma (Hart Crowser)	Reference Floyd 7/14/06 Rpt Fuglevand 10/18/06 Dep Ex. 15
A-37	2/27/85	Memorandum-Completion Report on WQIS Project 2 for the Commencement Bay Nearshore/Tideflats Remedial Investigation (A. Johnson, et al)	Reference Floyd 7/14/06
A-38	12/13/84	A Summary of Priority Pollutant Data for Point Sources and Sediment in Inner Commencement Bay: A Preliminary Assessment of Data and Considerations for Future Work (A. Johnson, et al)	Reference Floyd 7/14/06
A-39	10/10/00	Memorandum for Record re: Determination of the Suitability of Sediment to be Dredged for Manke Lumber Company and Louisiana-Pacific Corp. (D. Kendall et al)	Reference Floyd 7/14/06 Rpt
A-40	12/30/04	Memorandum for Record re: Supplemental Determination of the Suitability of Sediments to be Dredged for Manke Lumber Company for unconfined Open-water Disposal... (D. Kendall et al)	FS0027160-27181
A-41	01/25/05	Memorandum for Record re: Addendum and Volume Revision to Supplemental Determination of the Suitability of Sediments to be Dredged for Manke Lumber Company for Unconfined Open-water Disposal... (D. Kendall)	Reference Floyd 7/14/06 Rpt

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-42	02/22/84	Report of Sampling and Testing, Hylebos Waterway, Tacoma, Washington (Landau)	FS0008645-8722
A-43	05/10/91	Final Investigation Report Upper Hylebos Property, Tacoma Washington (Landau)	Reference Floyd 7/14/06 Rpt
A-44	06/15/06	Email to Kim Hughes, Weyerhaeuser Co. (M. Myers)	Reference Floyd 7/14/06 Rpt
A-45	03/13/95	Draft Commencement Bay Damage Assessment Quality Assurance Program Plan (NOAA)	Reference Floyd 7/14/06 Rpt
A-46	03/14/02	Hylebos Waterway Natural Resource Damage Settlement Proposal Report (Natural Resource Trustees)	WEY0015384- 0015425
A-47	04/00/96	Commencement Bay Sediment Trap Monitoring Program (Dale Norton)	Reference Floyd 7/14/06 Rpt
A-48	06/29/99	Puget Sound Dredged Disposal Analysis Full Characterization for Hylebos Wood Debris Group, Sampling and Analysis Plan (Pentec Environmental, et al)	FS0010930- 0011096
A-49	08/00/85	Final Report Commencement Bay Nearshore/Tideflats Remedial Investigation, Volume 1 (Tetra Tech)	Reference Floyd 7/14/06 Rpt
A-50	12/00/88	Commencement Bay Nearshore/ Tideflats Feasibility Study Executive Summary (Tetra Tech)	ARC0028637- 0028738
A-51	07/00/97	Explanation of Significant Differences, Commencement Bay Nearshore/Tideflats Superfund Site (USEPA)	Reference Floyd 7/14/06 Rpt
A-52	12/29/04	Five-Year Review Report, Commencement Bay Nearshore/Tideflats Superfund Site (USEPA)	Reference Floyd 7/14/06 Rpt
A-53		Agency Comments to Draft Remedial Action Construction Report should they be available now or become available during trial	
A-54	06/30/83	Sludge Investigation Results, Kaiser Aluminum and	EPA01191-01246

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Chemical Corporation Tacoma Works (Kaiser Aluminum & Chemical Corporation)	
A-55	09/02/87	Kaiser Aluminum and Chemical Corporation Closure Plan for Wet Scrubber Sludge Mgt Area (Landau)	WEY0019675-750
A-56	10/00/06	Hylebos Dredging Volume Calculations (Revised) (Table 1 to Floyd 1/01/06 Expert Rpt)	EX004249
A-57	10/00/06	Volume of Wood in Deposits since April 1971 (Table 2 to Floyd 11/01/06 Expert Rpt)	EX04250
A-58	10/00/06	Historical Soundings Along Channel Centerline (Figure 1 to Floyd 11/01/06 Expert Rpt)	EX004252
A-59	10/00/06	Historical Soundings Comparisons (Figure 2 to Floyd 11/01/06 Expert Rpt)	EX004253
A-60	00/00/72	Historical Soundings Comparison, 1972 Bathymetry v. Pre-Dredge (Figure 3 to Floyd Expert 11/01/06 Rpt)	EX004254
A-61	06/24/98	Figure 7.1 Wood Accumulation Areas and Bioassay ... (Floyd Dep. 10/10/06 Ex. 10)	FS0000087
A-62	04/00/71	Army Corps of Engineers survey – Hylebos Waterway Condition	Floyd Supp. 02/28/07 Dep., Ex. 4
A-63	06/00/65	Army Corps of Engineers survey - Hylebos Waterway Condition after dredging	HHCG00103109
A-64	09/00/72	Army Corps of Engineers survey - Hylebos Waterway Condition after dredging	HHCG00103115
A-65	02/00/69	Army Corps of Engineers survey - Hylebos Waterway Condition	Floyd Supp. 02/28/07 Dep., Ex. 7
A-66	No date	Chapter 173-204 WAC - Sediment Management Standards	
A-67	07/14/06	Curriculum Vitae of Paul D. Boehm, PhD,	EX003060- EX003067
A-68	03/00/99	Study Area with Sediment Sample Locations (Exhibit 5 to Boehm 7/14/06 Expert Report)	EX003077
A-69	00/00/00	Close-up of Study Area with Sediment Sample Locations	EX003078

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		(Exhibit 6 to Boehm 7/14/06 Expert Report)	
A-70	00/00/05	Aerial Photographs of the Study Area (Exhibit 7 to Boehm 7/14/06 Expert Report)	EX003079
A-71	No date	Aerial Photograph Focusing on the Area Around Weyerhaeuser's Tacoma Export Facility (TEF) (Exhibit 8 to Boehm 7/14/06 Expert Report)	EX003080
A-72	No date	Federal Register Analytical Target List of PAHs (Exhibit 9 to Boehm 7/14/06 Expert Report)	EX003081
A-73	No date	Allocation of PAH Compounds in Sediment Sample KD100C-A to Petrogenic and Pyrogenic Sources (Exhibit 10 to Boehm 7/14/06 Expert Report)	EX003082
A-74	No date	PAHs in the Hylebos Sediments are Largely from a Pyrogenic Sources (Exhibit 11 to Boehm 7/14/06 Expert Report)	EX003083
A-75	No date	The Minor Petrogenic PAH in the Collected Sediment Samples Originated from One Major Petrogenic PAH Source – The Kaiser Ditch/Taylor Way (Exhibit 12 to Boehm 7/14/06 Expert Report)	EX 003084
A-76	No date	Comparing PAH Fingerprints from Kaiser Source Sample to those in Sediments (Exhibit 13 to Boehm 7/14/06 Expert Report)	EX003085
A-77	No date	Hylebos Sediment Samples Collected at the Kaiser Ditch Outfall (P100/P200 Locations) Resemble the KD100 Kaiser Source Sample (Exhibit 14 to Boehm 7/14/06 Expert Report)	EX003086
A-78	No date	Current Outflow of Surface Water from the Kaiser Ditch into the Hylebos Waterway (Exhibit 15 to Boehm 7/14/06 Expert Report)	EX003087
A-79	No date	Kaiser Former Wet Scrubber Sludge Ponds were Intimately Connected to the KD100 Location (Exhibit 16 to Boehm 7/14/06 Expert Report)	EX003088
A-80	No date	KD100 Sediment Sample Location (Exhibit 17 to Boehm 7/14/06 Expert Report)	EX003089
A-81	No date	Taylor Way and Stormwater (Exhibit 18 to Boehm 7/14/06 Expert Report)	EX003090
A-82	No date	PAH Patterns Reveal Pyrogenic PAH Dominance and Source	EX003091

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Upstream from TEF (Exhibit 19 to Boehm 7/14/06 Expert Report)	
A-83	06/05/99	Close Proximity of Kaiser to the TEF (Exhibit 20 to Boehm 7/14/06 Expert Report)	EX003092
A-84	No date	Evidence of Fugitive Particulate Emissions from Kaiser (Exhibit 21 to Boehm 7/14/06 Expert Report)	EX003093
A-85	No date	Weyerhaeuser TEF Received PAH Contamination from Nearby Kaiser Operations (Exhibit 22 to Boehm 7/14/06 Expert Report)	EX003094
A-86	No date	Similarity Between PAHs in the Kaiser Ditch and Air Particulates (Exhibit 23 to Boehm 7/14/06 Expert Report)	EX003095
A-87	No date	Comparison Between PAH Content in Hydraulic Oil and PAHs in the Hylebos Sediment (Exhibit 24 to Boehm 7/14/06 Expert Report)	EX003096
A-88	No date	Special Focus on TEF Wood Residuals. PAHs in Wood Residual Samples Show Evidence of Kaiser Particulates (Exhibit 25 to Boehm 7/14/06 Expert Report)	EX003097
A-89	No date	Comparison Between PAHs in Fresh Bark and Wood Residuals at TEF (Exhibit 26 to Boehm 7/14/06 Expert Report)	EX003098
A-90	No date	Comparison Between Paths in Wood Residuals and Air Particulates (Exhibit 27 to Boehm 7/14/06 Expert Report)	EX003099
A-91	No date	Chemical Fingerprints of Wood Debris from TEF Do Not Match the Hylebos or Kaiser Ditch Sediments (Exhibit 28 to Boehm 7/14/06 Expert Report)	EX003100
A-92	No date	Chemical Fingerprints in Hylebos Sediments are Different from Those in the Pilings (Exhibit 29 to Boehm 7/14/06 Expert Report)	EX003101
A-93	No date	PAHs from the P100 Location (Dredging Area Seaward of Kaiser Ditch) Match Kaiser Ditch Sediments and Do Not Resemble Weathered Creosote (Exhibit 30 to Boehm 7/14/06 Expert Report)	EX003102
A-94	No date	Principal Component Analysis Scores Indicate that the Ditch Samples and the Hylebos Perimeter Samples are Similar (Exhibit 31 to Boehm 7/14/06 Expert Report)	EX003103
A-95	00/00/93	Chlorinated Polycyclic Aromatic Hydrocarbons: Method of	Reference Boehm

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Analysis and Their Occurrence in Urban Air. Environ Sci Tech V27, n9, p1826 (6). September (Nilsson, et al)	8/31/06 Rpt
A-96	00/00/87	Analysis of Halogenated Polycyclic Aromatic Hydrocarbons in Urban Air, Snow and Automobile Exhaust (Haglund, et al.)	Reference Boehm 8/31/06 Rpt
A-97	00/00/06	Discussion of Figure 28 from Dalton (2006) (Ex. 2 to Boehm 8/31/06 Rpt)	EX003156-3157
A-98	00/00/06	Discussion of Figure 29 from Dalton (2006) (Ex. 2 to Boehm 8/31/06 Rpt)	EX003158-3159
A-99	00/00/06	Discussion of Figure 31 from Dalton (2006) (Ex. 2 to Boehm 8/31/06 Rpt)	EX003160-3161
A-100	12/00/96	SW-846 manual for waste testing. Chapter 4. U.S. Environmental Protection Agency, Washington, DC. (USEPA.)	Reference Boehm 10/31/06 Rpt; Farlow Dep. Ex. 2
A-101	10/31/06	The PAH Fingerprint of Sooke Bay, Canada Creosote Sample presented by Farlow closely resembles the 1992 WSS samples	EX004269 Revised
A-102	10/31/06	PAH distribution in the dredged sediment from CO-14 is very similar to the PAH distribution in the 1992 WSS samples, a close match considering post-release weathering of WSS	EX004270 Revised
A-103	10/31/06	PAH concentration gradient in the CO-14 area shows much higher concentrations near the Kaiser Ditch and no indication of a source from the TEF dock	EX004271 Revised
A-104	11/1/90	City of Tacoma Industrial Wastewater Pretreatment Program Inspection Report	WEY0003228- 3229;
A-105	03/00/93	Evaluation of Weyerhaeuser's Tacoma export facility and its relationship to the head of the Hylebos Waterway problem area. Prepared for Weyerhaeuser Company, Federal Way, WA. (PTI)	WEY0016137- 16162;
A-106	00/00/00	Distribution and Sources of PAHs in Urban Surface Soils (META)	Boehm
A-107	00/00/83	Photos pre-dredging 1983(DOE) and post-dredging June 1999(Boehm)	Boehm
A-108	07/00/06	Curriculum Vitae of Scott A. Recker, P. G.	EX003388-3390

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-109	07/00/06	Experience Summary of Scott A. Recker, P.G.	EX003393-3394
A-110	09/12/83	Insurance Loss Control Report for Kaiser Aluminum and Chemical Corporation Tacoma Works. (Jamison Insurance Services)	WEY0026172-26181
A-111	02/21/86	Letter and Memorandum describing the results of a January 31, 1986 meeting between Kaiser, Landau, and Ecology regarding closure and post-closure tasks for the spent potliner storage area. (Kaiser)	Reference Recker 7/14/06 Rpt
A-112	06/30/83	Wet Sludge Working Papers. (Kaiser)	WEY0019019-19078
A-113	12/09/74	NPDES Application for Permit to Discharge Wastewater, Standard Form C – Manufacturing and Commercial. (Kaiser)	Reference Recker 7/14/06 Rpt
A-114	10/29/69	Water Pollution Control Commission Application to discharge wastes into State Waters. (Kaiser)	Reference Recker 7/14/06 Rpt
A-115	04/17/96	PAH Fingerprinting Analysis and Dredging History in Hylebos Waterway Near Kaiser Ditch. (Landau)	WEY0029305-29324
A-116	00/00/89	Wet Scrubber Sludge, Tacoma Works, Kaiser Aluminum & Chemical Corporation Tacoma, WA. (Landau) (Reference Recker 7/14/06 Expert Rpt)	Reference Recker 7/14/06 Rpt
A-117	07/20/89	Wet Scrubber Sludge Sampling Results. (Landau)	Reference Recker 7/14/06 Rpt
A-118	05/29/87	Proposed Remedial Action Wet Scrubber Management Facility, Kaiser Aluminum, Tacoma, WA. (Landau)	Reference Recker 7/14/06 Rpt
A-119	01/26/87	PCB Leak Cleanup Plan, Kaiser Aluminum, Tacoma, Washington Facility. (Landau)	WEY0015897-15936
A-120	07/09/86	Closure Plan, Spent Potlining Management Facility, Kaiser Aluminum & Chemical Corporation, Tacoma Works. (Landau)	WEY0019565-19616
A-121	10/10/84	Report of Construction Monitoring Sludge Cleanup Kaiser Aluminum, Tacoma, WA. (Landau)	WEY0026012-26021
A-122	03/28/83	Proposal Engineering Services, Wet Scrubber Sludge Management for Kaiser Aluminum. (Landau)	Reference Recker 7/14/06 Rpt
A-123	00/00/94	WATER QUALITY – Prevention, Identification Management of Diffuse Pollution. (Novotny, et al.)	Reference Recker 7/14/06 Rpt

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-124	04/02/68	Letter to Robert Stockman, (Washington State Department of Health) from E. R. Hendrickson.	DEL00224-240
A-125	07/11/90	Consent Decree No. 90-2-06209-6. (WA State Depart. of Ecology)	Reference Recker 7/14/06 Rpt
A-126	02/24/89	NPDES Permit Application for Kaiser Aluminum & Chemical Corporation. (WA State Depart. of Ecology)	WEY0015689- 15734
A-127	03/00/87	An Investigation into Potential Sources of PCB Contamination in Hylebos Waterway. (WA State Depart. of Ecology)	ARC0009769- 9797
A-128	08/13/85	Order No. DE 85-573. (WA State Depart. of Ecology)	Reference Recker 7/14/06 Rpt
A-129	11/01/83	Memorandum to Fred Fenske from Tim Nord regarding Chapter 173-303 WAC Compliance Inspection at Kaiser. (WA State Depart. of Ecology)	DEL00312-332
A-130	08/15/83	Department of Ecology Order No. 83-386: In the Matter of Sludge Control and Treatment at the Kaiser Aluminum and Chemical Corporation Tacoma Reduction Plant in Compliance with Rules and Regulations of the Department of Ecology. (WA State Depart. of Ecology)	DEL00116-117
A-131	07/12/83	Detailed Chemical Results for Characterization of Sludge Marsh Area Loading to Waterway. (WA State Depart. of Ecology)	WEY0019206- 19210
A-132	04/15/83	Department of Ecology Order No. 83-197: In the Matter of Determining Sludge Effects on Water Quality by the Kaiser Aluminum and Chemical Corporation, Tacoma Works. (WA State Depart. of Ecology)	EPA01077
A-133	07/24/75	NPDES Waste Discharge Permit for Kaiser Aluminum Chemical Corporation. (WA State Depart. of Ecology)	Reference Recker 7/14/06 Rpt
A-134	04/99	Hylebos Waterway Wood Debris Group Cleanup Action Plan(Floyd & Snider)	FS0010858-927
A-135	5/01/99	Construction Documentation Site Cleanup Action Weyerhaeuser	FS0025059-089
A-136	1971	Army Corps of Engineers, Permit to Weyerhaeuser re: Dock Construction	
A-137	1971	Army Corps of Engineers, Permit to Weyerhaeuser re:	

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Ramp/Floating Walkway Construction	
A-138	1976	Army Corps of Engineers, Permit to Weyerhaeuser re: Berthing Deepening	
A-139	10/09/92	Puget Sound Air Pollution Agency, October 9, 1992, Registration File Listing for Kaiser Aluminum and Chemical Corp. Tacoma, WA	
A-140	06/16/06	Figure – Vicinity Map Kaiser Facility & Weyerhaeuser Tacoma Export Facility Tacoma, WA (Revised 6/16/06) (Figure 1 to Recker 7/14/06 Expert Report)	EX003396
A-141	06/16/06	Wet Scrubber Sludge Management Areas Kaiser Facility and West Adjacent Property Tacoma, WA (Revised 6/16/06) (Figure 2 to Recker -7/14/06 Expert Report)	EX003397
A-142	06/16/06	Spent Potliner Storage Areas Kaiser Facility Tacoma, WA (Revised 6/16/06) (Figure 3 to Recker 7/14/06 Expert Report)	EX003398
A-143	06/16/06	Material and Waste Storage Locations Kaiser Facility Tacoma, WA (Revised 6/16/06) (Figure 4 to Recker 7/14/06 Expert Report)	EX003399
A-144	06/16/06	1969 Stormwater/Wastewater Collection and Discharge Locations Kaiser Facility Tacoma, WA (Revised 6/16/06) (Figure 5 to Recker 7/14/06 Expert Report)	EX003400
A-145	06/16/06	1995 Stormwater/Wastewater Collection and Discharge Locations Kaiser Facility Tacoma, WA (Revised 6/16/06) (Figure 6 to Recker 7/14/06 Expert Report)	EX003401
A-146	03/26/06	Kaiser Ditch & Hylebos Waterway Configuration: 1951 to 1959 Tacoma, WA (Revised 3/26/01) (Figure 7 to Recker 7/14/06 Expert Report)	EX003402
A-147	03/26/01	Kaiser Ditch & Hylebos Waterway Configuration: 1959 to Present Tacoma, WA (Revised 3/26/01) (Figure 8 to Recker 7/14/06 Expert Report)	EX003403
A-148	07/00/06	General view of Kaiser facility and the adjacent Sludge Management Area. (Photograph 1 to Recker 7/14/06 Expert Report)	EX003405
A-149	07/00/06	Sampling activities during the 1983 Ecology investigation. (Photograph 2 to Recker 7/14/06 Expert Report)	EX003406
A-150	07/00/06	Erosion of sludge in the SMA. (Photograph 3 to Recker	EX003407

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		7/14/06 Expert Report)	
A-151	07/00/06	The SMA during the 1983 Ecology investigation. (Photograph 4 to Recker 7/14/06 Expert Report)	EX003408
A-152	07/00/06	The SMA during the 1983 Ecology investigation. (Photograph 5 to Recker 7/14/06 Expert Report)	EX003409
A-153	07/00/06	Sludge in the SMA. (Photograph 6 to Recker 7/14/06 Expert Report)	EX003410
A-154	07/00/06	Accumulation of sludge in the Kaiser Ditch. (Photograph 7 to Recker 7/14/06 Expert Report)	EX003411
A-155	07/00/06	Accumulation of sludge in the Kaiser Ditch. (Photograph 8 to Recker 7/14/06 Expert Report)	EX003412
A-156	07/00/06	1969 aerial photograph showing dark irregular patterns on the ground surface in the Outfall 003 drainage area. (Photograph 9 to Recker 7/14/06 Expert Report)	EX003413
A-157	1955	1955 Aerial Photograph Hylebos Tacoma, WA (Figure 1 to Recker 9/01/06 Rpt)	EX003420
A-158	1959	1959 Aerial Photograph Hylebos Tacoma, WA (Figure 2 to Recker 9/01/06 Rpt)	EX003421
A-159	1960	1960 Aerial Photograph Hylebos Tacoma, WA (Figure 3 to Recker 9/01/06 Rpt)	EX003422
A-160	08/29/06	1965 Aerial Photograph Hylebos Tacoma, WA (Figure 4 to Recker 9/01/06 Rpt)	EX003423
A-161	08/29/06	1979 Aerial Photograph Hylebos Tacoma, WA (Figure 5 to Recker 9/01/06 Rpt)	EX003424
A-162	08/29/06	1985 Aerial Photograph Hylebos Tacoma, WA (Figure 6 to Recker 9/01/06 Rpt)	EX003425
A-163	06/15/06	Letter to Hughes from Recker re Hylebos Waterway Sediment Investigation, Permitting and Remediation (Recker 3/9/07 Dep Ex 4)	Recker 3/9/07 Dep. Ex. 4
A-164	09/14/98	Memorandum to Floyd from Reimers re Preliminary Assessment of Required Cleanup Actions, Maintenance Dredging and Nearshore Facility -Improvements within the Hylebos Wood Debris Site(Recker 3/9/07 Dep Ex. 6)	Recker 03/09/07 Dep. Ex 6
A-165	07/13/06	Curriculum Vitae of Walter J. Shields, Ph.D.	EX003549 – EX003570

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-166	04/05/93	Inspection Report regarding General Metals (Cloud) (Reference to Table 5-13)	WDOE-A0003163-64
A-167	12/07/77	Inspection Report regarding General Metals (Ecology) (Reference to Table 5-13)	WDOE-A0018467
A-168	06/17/77	Inspection Reports Regarding General Metals (Ecology) (Reference to Table 5-13)	WDOE-A0018469
A-169	07/11/84	Inspection Report – General Metals (WADOE) (Reference to Table 5-13)	WDOE-A0018435-36
A-170	01/07/86	Environmental Complaint about General Metals Site (WA State Dept. of Ecology) (Reference to Table 5-13)	WDOE-A0002837
A-171	07/01/86	Inspection Report and MSDSs Regarding General Metals Site (WA State Dept. of Ecology) (Reference to Table 5-13)	WDOE-A0002829
A-172	02/25/87	Environmental Complaint and Hazardous Materials Incident Worksheet for General Metals Site (WADOE) (Reference to Table 5-13)	WDOE-A0002742-43
A-173	06/21/89	Inspection Report for General Metals (White et al.) (Reference to Table 5-13)	WDOE-A0000640-41
A-174	03/07/90	Ecology Environmental Report (#S358) for General Metals (James) (Reference to Table 5-13)	WDOE-A0002429-32
A-175	12/11/91	Inspection Report, General Metals of Tacoma (Kourehdar et al.) (Reference to Table 5-13)	WDOE-A0003185-89
A-176	08/18/87	Personal communication (Letter to R. Miller, General Metals of Tacoma, Inc., Tacoma, WA. regarding violations of EPA regulations at the General Metals facility). U.S. Environmental Protection Agency, Seattle, WA. (Haselberer) (Reference to Table 5-13)	WDOE-A0002586-92
A-177	02/15/84	Kaiser Tacoma Hylebos sampling (no cover page). (Landau)	Reference Shields 07/13/06 Rpt
A-178	08/21/74	Inspection report regarding General Metals of Tacoma Facility. (WADOE) (Oberlander) (Reference to Table 5-13)	WDOE-A0018516-17
A-179	01/02/73	Personal communication (internal memorandum to N. Thomas, (WADOE) re December 26, 1972, site visit at General Metals Tacoma Facility (Reference to Table 5-13)	WDOE-A0018519
A-180	05/19/83	Inspection report regarding General Metals of Tacoma Facility (Smith) (Reference to Table 5-13)	WDOE-A0018511-13

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST**Filed April 23, 2007**

	DATE	DESCRIPTION	BATES/ REFERENCE
A-181	03/00/87	An Investigation into Potential sources of PCB contamination in Hylebos Waterway. WA State Department of Ecology, Olympia, WA. (Stinson, et al.) (Reference to Table 5-13)	ARC0078038-63
A-182	01/24/91	UBAT inspection summary, General Metals. WA State Depart. of Ecology, Olympia, WA. (White, et al.) (Reference to Table 5-13)	WDOE-A0003729-30
A-183	06/27/89	Inspection Report for General Metals (White et al.) (Reference Shields 7/13/06 Expert Rpt, Reference Table 5-13)	WDOE-A0000639
A-184	07/13/89	Inspection Report for General Metals (Reference Shields 7/13/06 Expert Rpt, Table 5-13)	
A-185	07/13/89	Inspection Report for General Metals (Reference Shields 7/13/06 Expert Rpt, Table 5-13)	
A-186	03/05/91	Inspection Report for General Metals (White et al.) (Reference Shields 7/13/06 Expert Rpt. Table 5-13)	WDOE-A 0003558-59
A-187	00/00/46	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-188	06/06/55	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-189	09/01/59	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-190	06/23/60	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-191	06/23/60	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-192	09/08/61	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-193	09/08/61	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-194	09/08/61	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-195	09/08/61	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-196	09/08/61	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-197	09/08/61	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-198	06/29/65	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-199	03/25/69	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-200	03/25/69	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-201	03/25/69	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-202	05/02/70	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-203	06/12/74	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-204	05/31/78	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-205	05/21/79	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-206	05/21/79	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-207	05/21/79	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-208	07/15/79	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-209	07/16/81	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-210	08/18/82	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-211	03/03/85	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-212	03/03/85	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-213	03/03/85	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-214	06/19/85	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-215	07/20/88	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-216	07/11/89	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-217	05/03/92	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-218	05/03/92	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-219	05/03/92	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-220	08/10/92	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-221	06/19/96	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-222	06/20/96	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-223	06/20/96	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-224	08/08/00	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-225	00/00/00	Hylebos Waterway Aerial Photographs (Delta)	Shields Rpt 07/13/06
A-226	07/13/06	Site location map, Hylebos Waterway, Tacoma, Washington. (Figure 4-1 to Shields 7/13/06 Expert Rpt)	EX003496
A-227	06/00/55	Aerial Photograph (Figure 4-2 to Shields 7/13/06 Expert Rpt)	EX003497
A-228	09/00/59	Aerial Photograph (Figure 4-3 to Shields 7/13/06 Expert Rpt)	EX003498
A-229	06/00/60	Aerial Photograph (Figure 4-4 to Shields 7/13/06 Expert Rpt)	EX003499

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-230	09/00/61	Aerial Photograph (Figure 4-5 to Shields 7/13/06 Expert Rpt)	EX003500
A-231	06/00/65	Aerial Photograph (Figure 4-6 to Shields 7/13/06 Expert Rpt)	EX003501
A-232	02/00/55	Oblique Aerial Photograph of the Lower Turning Basin of the Hylebos Waterway and Surrounding Properties (Figure 4-7 to Shields 7/13/06 Expert Rpt)	EX003502
A-233	01/00/62	Oblique Aerial Photograph of the Hylebos Waterway and Surrounding Properties. (Figure 4-8 to Shields 7/13/06 Expert Rpt)	EX003503
A-234	08/00/63	Oblique Aerial Photograph of the Hylebos Waterway and Surrounding Properties (Figure 4-9 to Shields 7/13/06 Expert Rpt)	EX003504
A-235	05/00/70	Aerial Photograph (Figure 4-10 to Shields 7/13/06 Expert Rpt)	EX003505
A-236	06/00/74	Aerial Photograph (Figure 4-11 to Shields 7/13/06 Expert Rpt)	EX003506
A-237	05/00/78	Aerial Photograph (Figure 4-12 to Shields 7/13/06 Expert Rpt)	EX003507
A-238	06/00/85	Aerial Photograph (Figure 4-13 to Shields 7/13/06 Expert Rpt)	EX003508
A-239	07/00/89	Aerial Photograph (Figure 4-14 to Shields 7/13/06 Expert Rpt)	EX003509
A-240	06/00/96	Aerial Photograph (Figure 4-15 to Shields 7/13/06 Expert Rpt)	EX003510
A-241	06/00/02	Aerial Photograph (Figure 4-16 to Shields 7/13/06 Expert Rpt)	EX003511
A-242	07/13/06	ROD SQO Exceedance Factors in Surface Grab Stations (Figure 5-1 to Shields 7/13/06 Expert Rpt)	EX003512
A-243	07/13/06	ROD SQO Exceedance Factors in Core Stations (Figure 5-2 to Shields 7/13/06 Expert Rpt)	EX003513
A-244	07/13/06	Facility Map of Arkema – 2901 Taylor Way (Figure 5-3 to Shields 7/13/06 Expert Rpt)	EX003514
A-245	00/10/60	Oblique Aerial Photograph of the Lower Turning Basin of the Hylebos Waterway (Figure 5-4 to Shields 7/13/06 Expert Rpt)	EX003515

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-246	07/13/06	Facility Map of Arkema – 3009 Taylor Way (Dunlap Towing Site) (Figure 5-5 to Shields 7/13/06 Expert Rpt)	EX003516
A-247	10/00/68	Oblique Aerial Photograph of Kaiser and the Hylebos Waterway (Figure 5-6 to Shields 7/13/06 Expert Rpt)	EX003517
A-248	06/00/67	Oblique Aerial Photograph of General Metals (Figure 5-7 to Shields 7/13/06 Expert Rpt)	EX003518
A-249	00/00/69	Oblique Aerial Photograph of General Metals (Figure 5-8 to Shields 7/13/06 Expert Rpt)	EX003519
A-250	07/13/06	Map of General Metals (Figure 5-9 to Shields 7/13/06 Expert Rpt)	EX003520
A-251	07/13/06	Images of Miscellaneous Debris on Hylebos Waterway Adjacent to General Metals (Figure 5-10 to Shields 7/13/06 Expert Rpt)	EX003521
A-252	07/13/06	Facility Map of Kaiser Aluminum (Figure 5-11 to Shields 7/13/06 Expert Rpt)	EX003522
A-253	09/00/69	Oblique Aerial Photograph of Kaiser and Surrounding Properties (Figure 5-12 to Shields 7/13/06 Expert Rpt)	EX003523
A-254	00/00/69	Oblique Aerial Photograph of Hylebos Waterway and Surrounding Properties (Figure 5-13 to Shields 7/13/06 Expert Rpt)	EX003524
A-255	07/13/06	Facility Map of Tacoma Boatbuilders (Figure 5-14 to Shields 7/13/06 Expert Rpt)	EX003525
A-256	10/00/69	Oblique Aerial Photograph of Tacoma Boatbuilders and Surrounding Properties (Figure 5-15 to Shields 7/13/06 Expert Rpt)	EX003526
A-257	07/13/06	Facility Map of the Weyerhaeuser Tacoma Export Facility (Figure 5-16 to Shields 7/13/06 Expert Rpt)	EX003527
A-258	07/13/06	Head of Hylebos Chemicals of Concern (Table 5-1 to Shields 7/13/06 Expert Rpt)	EX003529
A-259	00/00/81	Estimate of Arsenic Loading Rates from the Arkema 2901 Taylor Way Site to the Hylebos Waterway (Table 5-2 to Shields 7/13/06 Expert Rpt)	EX003530
A-260	00/00/81	EPA/Ecology Class II Survey (1981) Estimate of Arsenic, mercury, and Zinc Loading Rates from the Arkema 2901 Taylor Way Site to the Hylebos Waterway (Table 5-3 to	EX003531

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Shields 7/13/06 Expert Rpt)	
A-261	00/00/85	Estimate of Arsenic, Mercury, and Zinc loading Rates from the Arkema 2901 Taylor Way Site to the Hylebos Waterway. (Tetra Tech) (Table 5-4 to Shields 7/13/06 Expert Rpt)	EX003532
A-262	00/00/86	Estimate of Arsenic Loading Rates from the Arkema 2901 Taylor Way Site to the Hylebos Waterway (Crowser) (Table 5-5 to Shields 7/13/06 Expert Rpt)	EX003533
A-263	07/13/06	Estimate of Arsenic Loading rates from the Arkema 2901 Taylor Way Site to the Hylebos Waterway from January 1965 to March 1993 (Table 5-6 to Shields 7/13/06 Expert Rpt)	EX003534
A-264	07/13/06	Total Estimated Arsenic Contribution from the 2901 Taylor Way Arkema Site to the Hylebos Waterway from January 1965 to March 1993 (Table 5-7 to Shields 7/13/06 Expert Rpt)	EX003535
A-265	07/13/06	Ecology (1983-1984) Estimate of Average Annual Daily Metals Loads I Runoff from the Arkema 3009 Taylor Way (Dunlap Towing) Site to the Hylebos Waterway (Table 5-8 to Shields 7/13/06 Expert Rpt)	EX003536
A-266	07/13/06	ENSR Estimate of Mass Loadings in Surface Water/groundwater from the Arkema 3009 Taylor Way (Dunlap Towing) Site to the Hylebos Waterway in 1989 (Table 5-9 to Shields 7/13/06 Expert Rpt)	EX003537
A-267	00/00/99	Ecology (1999) Estimate of Storm Water Loading Rates for Arsenic and Zinc from the Arkema 3009 Taylor Way (Dunlap Towing) Site to the Hylebos Waterway (Table 5-10 to Shields 7/13/06 Expert Rpt)	EX003538
A-268	07/13/06	Total Estimated Arsenic and Zinc Contribution from 3009 Taylor Way (Dunlap Towing) Site to the Hylebos Waterway from July 1964 to January 2000 (Table 5-11 to Shields 7/13/06 Expert Rpt)	EX003539
A-269	07/13/06	Ships Sold to General Metals for Scrapping (Table 5-12 to Shields 7/13/06 Expert Rpt)	EX003540
A-270	07/13/06	Summary of Inspections at General Metals (Table 5-13 to Shields 7/13/06 Expert Rpt)	EX003541 -- EX003542
A-271	07/13/06	Chronological Summary of Aluminum Smelting Operations at Kaiser (Table 5-14 to Shields 7/13/06 Expert Rpt)	EX003543

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-272	07/13/06	Summary of Kaiser Waste Management Practices (Table 5-15 to Shields 7/13/06 Expert Rpt)	EX003544
A-273	07/13/06	Summary of Waste Sources and Pathways at Kaiser (Table 5-16 to Shields 7/13/06 Expert Rpt)	EX003545
A-274	07/13/06	Estimated Loads of Chemicals from Tacoma Boatbuilders to the Hylebos Waterway (Table 5-17 to Shields 7/13/06 Expert Rpt)	EX003546
A-275	07/13/06	Summary of Select Groundwater Analytical results of Kaiser's Sampling on TEF Property (Table 5-18 to Shields 7/13/06 Expert Rpt)	EX003547
A-276	07/13/06	Summary of total Arsenic, PAHs, PCBs, Mercury, and Zinc Estimated Contributions from Select Properties to the Hylebos Waterway (Table 6-1 to Shields 7/13/06 Expert Rpt)	EX003548
A-277	00/00/01	Atofina Kaiser Ditch sampling records October – Dec. 2001; Jan. 2002	
A-278	07/13/06	Photograph 1 and Photograph 2 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003697
A-279	07/13/06	Photograph 3 and Photograph 4 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003698
A-280	07/13/06	Photograph 5 and Photograph 6 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003699
A-281	07/13/06	Photograph 7: and Photograph 8 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003700
A-282	07/13/06	Photograph 9 and Photograph 10 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003701
A-283	07/13/06	Photograph 11 and Photograph 12 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003702
A-284	07/13/06	Photograph 13 and Photograph 14 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003703
A-285	07/13/06	Photograph 15 and Photograph 16 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003704
A-286	07/13/06	Photograph 17 and Photograph 18 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003705
A-287	07/13/06	Photograph 19 and Photograph 20 (Exhibit 3 –Shields	EX003706

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		7/13/06 Expert Rpt)	
A-288	07/13/06	Photograph 21 and Photograph 22 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003707
A-289	07/13/06	Photograph 23 and Photograph 24 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003708
A-290	07/13/06	Photograph 25 and Photograph 26 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003709
A-291	07/13/06	Photograph 27 and Photograph 28 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003710
A-292	07/13/06	Photograph 29 and Photograph 30 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003711
A-293	07/13/06	Photograph 31 and Photograph 32 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003712
A-294	07/13/06	Photograph 33 and Photograph 34 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003713
A-295	07/13/06	Photograph 35 and Photograph 36 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003714
A-296	07/13/06	Photograph 37 and Photograph 38 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003715
A-297	07/13/06	Photograph 39 and Photograph 40 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003716
A-298	07/13/06	Photograph 41 and Photograph 42 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003717
A-299	07/13/06	Photograph 43 and Photograph 44 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003718
A-300	07/13/06	Photograph 45 and Photograph 46 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003719
A-301	07/13/06	Photograph 47 and Photograph 48 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003720
A-302	07/13/06	Photograph 49 and Photograph 50 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003721
A-303	07/13/06	Photograph 51 and Photograph 52 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003722
A-304	07/13/06	Photograph 53 and Photograph 54 (Exhibit 3 –Shields	EX003723

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		7/13/06 Expert Rpt)	
A-305	07/13/06	Photograph 55 and Photograph 56 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003724
A-306	07/13/06	Photograph 57 and Photograph 58 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003725
A-307	07/13/06	Photograph 59 and Photograph 60 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003726
A-308	07/13/06	Photograph 61 and Photograph 62 (Exhibit 3 –Shields 7/13/06 Expert Rpt)	EX003727
A-309	1969	Photograph of Lonestar and Hylebos Waterway	
A-310	12/26/90	Letter/Attachment to City of Tacoma Public Works from Warren G. Hanson (OnSite Enterprises, Inc.) forwarding Weyerhaeuser Vehicle Wash Pad an Oil/Water Permit Application	WEY0003230-3267
A-311	03/08/93	Letter to Hiltner (USEPA) from Pistoiresi (WY)	Shields 11/07/06 Dep Ex 13
A-312		Letter to R.W. McLean (WY) from Michael Price (City of Tacoma Public Works)	WEY0027212-27213;
A-313	9/21/90	Atochem North America, Inc.'s (Penwalt) Request for Removal from the List of Violating Facilities	WDOE-A0017547-587
A-314	9/18/86	Memorandum to USEPA from Ecology and Environment, Inc. re: Dunlap Towing Log Sort Yard Trip Report	WDOE-A0013514-13518
A-315	07/00/06	Resume of Raymond F. Dovell, CPA	EX003191-3194
A-316	07/00/06	Hylebos Waterway & Hylebos Wood Debris Sites Summary of Costs and Interest	EX003176-3180
A-317	12/17/97	Agreed Order between Ecology and WDG	WEY0020455-20508
A-318	06/11/02	WDG Arbitration Decision	WEY0002694 – 2699
A-319	No date	Wilder Invoices	WEY0011968 – 0011972
A-320	07/00/06	Schedule - Costs for the Cleanup Study Under the Agreed Order and Plans, plus all Invoices and other documents listed in the schedule, i.e.	EX003182-3183
A-321	07/00/06	Schedule - Costs for Dredging Under the Consent Decree,	EX003184

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		plus all Invoices and other documents listed in the schedule, i.e.	
A-322	07/00/06	Schedule - Costs Related to HHCG's Dredging and Reconstruction Work, plus all Invoices and other documents listed in the schedule, i.e.	EX003185
A-323	07/00/06	Schedule - Costs for Investigation of Kaiser Aluminum and the Kaiser Ditch, plus all Invoices and other documents listed in the schedule, i.e.	EX003186-3187
A-324	07/00/06	Schedule - Costs for the Delta Cleanup Coordinator, plus all Invoices and other documents listed in the schedule, i.e.	EX003188-3190
A-325	08/00/06	Examples of Redacted Legal Bill	EX003213-3221
A-326	11/16/06	Revised Ex. 1 Consisting of Summary of Costs and interest, interest calculation costs for the investigation of Kaiser Aluminum and Kaiser Ditch	Dovell 11/16/06 Dep. Ex. 3
A-327	00/00/91	Comparison of computed (POM) and current velocities measured at Station H7, based on Figure 4.1 from the report (Figure 1 to Shepsis 10/31/06 Rpt)	EX004214
A-328	10/31/06	Comparison of computed (POM) and measured current velocities at Station Puy, based on Figure 4.2 from the report (Figure 2 to Shepsis 10/31/06 Rpt)	EX004215
A-329	10/31/06	Comparison of computed (POM) and measured current velocities at Station Elf Atochem, Depth 5.6 meters, based on Figure 4.3b from the report (Figure 3 to Shepsis 10/31/06 Rpt)	EX004216
A-330	10/31/06	Comparison of computed (POM) and measured current velocities at Elf Atochem Pier for Dep 0.9 meters, based on 4.3a from the report (Figure 4 to Shepsis 10/31/06 Rpt)	EX004217
A-331	01/25/02	Affidavit of Shepsis from Larson v. Nelson (Shepsis 11/30/06 Dep., Ex. 3)	Shepsis Dep. 11/30/06, Ex. 3
A-332	04/01/06	Papers Accepted for Oral Presentation at ICCE 2006 (Shepsis 11/30/06 Dep., Ex. 4)	Shepsis Dep. 11/30/06, Ex. 4
A-333	11/20/06	Database searches for Shepsis Publications (Shepsis 11/30/06 Dep., Ex. 5.)	Shepsis Dep. 11/30/06, Ex. 5
A-334	11/17/06	Journal of Coastal Research (Shepsis 11/30/06 Dep., Ex. 6)	Shepsis Dep. 11/30/06, Ex. 6

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-335	00/00/84	Shore Protection Manual Volume I (US Army Corps of Engineers)	
A-336	00/00/00	3.4 Princeton Ocean Model of tidal currents	ITR-000016; ITR-000023
A-337	00/00/00	Initiation of Movement of Quartz Particles (Lick, et al.)	
A-338	06/01/06	Chapter 2 Meteorology and Wave Climate	
A-339	08/00/04	Journal of Hydraulic Engineering (ASCE)	
A-340	05/22/95	Dr. Shepsis Validation certificate from the US Education Evaluation Committee	
A-341	00/00/82	Dr. Shepsis University Diploma	
A-342	06/00/00	Draft Report: Development and Application of a Three-dimensional Numerical Model of the Time-dependent Circulation and Sediment Transport in the Hylebos	HR000000071-151;
A-343	No date	Google map of the waterways (Bornhold 11/28/06 Dep. Ex. 5)	Bornhold 11/28/06 Dep Ex 5
A-344	01/08/02	Letter and enclosure to Mike McNulty from Steve Parkinson, (Bornhold 11/28/06 Dep. Ex. 6)	Bornhold 11/28/06 Dep Ex. 6
A-345	01/03/00	Letter to Mr. Wolf from Dr. Thomson (Bornhold 11/28/06 Dep., Ex. 7)	ARC0068654 - 0068674
A-346	08/00/01	Draft report: Development and Application of a Three-dimensional Numerical Model of the Time-dependent Circulation and Sediment Transport in the Hylebos: Part II prepared for ENSR	HRO00000023-70;
A-347	11/27/06	E-mail from Darryl Broadbrooks to Mark Coldiron re typos in Bornhold 8/16/06 Report	Bornhold Dep. 11/28/06, Ex. 12
A-348		Chapter 2 of the Corps of Engineers Manual	Bornhold 3/29/07 Dep. Ex. 2
A-349	3/28/01	Acoustic Seabed Classification Survey Esquimalt Harbour (Quester)	BORN00000632-693
A-350	06/09/72	Construction contract with American Pile Driving Co.	FS0025804-25826
A-351	11/10/71	Letter to Corps of Engineers from Southwest Regional	WDOE-

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Office	A0018244-18248
A-352	06/30/06	Aerials of Historic Log Raft Coverage (Dalton 11/13/06 Dep., Ex. 8)	Dalton 11/13/06 Dep., Ex. 8 Wolf 10/11/06 Dep. Ex. 5
A-353	10/18/96	Letter to Fuglevand from Hiltner re Review of Draft Event 1C and II Addendum to the Pre-Remedial Design Data Report (Farlow 10/12/06 Dep. Ex. 4)	HCC00013060- 13061
A-354	No date	Review of the Event 1C Phase I and II Addendum to the Pre-Remedial Design Data Report (Farlow 10/12/06 Dep. Ex. 5)	HCC00014131- 14132
A-355	01/22/97	Letter to Fuglevand from Hiltner re Comments on Potential for Recontamination Report(Oct 16, 1996)(Farlow 10/12/06 Dep., Ex. 6)	HCC00014127- 14128
A-356	6/19/97	Review of Hylebos Waterway Pre-Remedial Design Program Report (Farlow 10/12/06 Dep. Ex. 7)	HCC00015180- 15182; Various WEY
A-357	02/08/95	Memorandum to Betsy Striplin from Raleigh Farlow re: Hylebos Waterway Pre-remedial Deign, Events 1A & 1B, Preliminary Data Evaluation (Farlow 10/12/06 Dep., Ex. 8)	ARC0003984- 4020
A-358	10/13/06	Email from Meyers to Fuglevand re Farlow (Farlow 10/12/06 Dep., Ex 9)	HHCG_TIFF0004 0158;
A-359	09/17/04	Email chain re Wood Debris testing (Farlow 10/12/06 Dep., Ex. 10)	HHCG_TIFF0003 8666-38668
A-360	01/10/05	Email chain re: Request for Hylebos info (Farlow 10/12/06 Dep., Ex. 11)	HHCG_TIFF0005 2256-57
A-361	04/25/05	Email chain re: Request for determination of invoice status (Farlow 10/12/06 Dep., Ex. 12)	HHCG_TIFF0005 1547-50
A-362	No date	Various drawings and maps prepared by Delta re Kaiser Facility (Farlow 10/12/06 Dep., Ex. 14)	WEY0018229- 18239
A-363	No date	Estimate of potential contributes of HPAH from creosote treated pilings in the WEY TEF dock(Farlow 10/12/06 Dep., Ex. 18)	DMD004358

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-364	10/12/06	Correction to Farlow 8/30/06 Rebuttal	Farlow 10/12/06 Dep., Ex. 19
A-365	10/12/06	Correction to Farlow 7/14/06 Report	Farlow 10/12/06 Dep., Ex. 20
A-366	06/01/97	Literature review, computer model and assessment (Brooks) (Farlow 10/12/06 Dep., Ex. 21)	EX000690-789
A-367	10/17/05	Creosote-Treated Wood in Aquatic Environments Technical Review and use recommendations. (Stratus) (Farlow 10/12/06 Dep., Ex. 22)	EX000790-893
A-368	12/28/03	Environmental response to creosote-treated wood structures in Puget Sound (Brooks)	Farlow 10/12/06 Dep., Ex. 23
A-369	03/06/06	Comment regarding Stratus document	Farlow 10/12/06 Dep., Ex. 24
A-370	No date	"Weathering effects on the decay resistance of creosote- treated oak" (Chow) (Farlow 10/12/06 Dep., Ex. 25)	EX000957-965
A-371	8/16/04	Region III Quality Assurance Team Frequently Asked Questions	Farlow 3/29/07 Dep Ex. 6
A-372	3/22/07	Memorandum to Dalton from Farlow re Follow-up to 11/9/06 memo re Historical Kaiser Tacoma facility activities	Farlow 3/29/07 Dep. Ex. 7
A-373	7/17/97	Memorandum from R. Farlow re: Kaiser Sludge Characterization Follow-up to 7/12/97 Memorandum to ARI	DMD002338-2356
A-374	Compiled 12/17/05	Second Pass Dredging Worksheets (DOF) HOH Sediment Remediation Project (pages 1-767)	
A-375	7/21/06	Figure 3-1c Marine-Based Remedial Action Areas	
A-376	7/21/06	Dredge Plan Sheet 4 Station 129+00 to 141+00	
A-377	7/21/06	Dredge Plan Sheet 5 Station 141+00 to 153+00	
A-378	11/00/02	Figure 2-8 Recent and Native Sediment Photograph	Fuglevand 10/18/06 Dep Ex. 9
A-379	9/00/04	Dredging photographs of dredged sediment	Fuglevand 10/18/06 Dep. Ex. 10
A-380	9/00/04	Dredging photographs showing dredging project	Fuglevand

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
			10/18/06 Dep. Ex. 11
A-381	Compiled 12/17/05	DOF Sediment Sampling Field documentation (168 pp)	
A-382	Compiled 12/17/05	Bean Daily Dredge Log (214 pp)	
A-383	Compiled 12/17/05	Bean Weekly Log - Bonacavor (32 pp)	
A-384	07/21/06	Letter to USEPA with excerpt from Agency Review Draft, Remedial Action Construction Report, Part 1	Fuglevand 10/18/06 Dep. Ex. 18
A-385	Compiled 12/17/05	DOF Daily Dredge Report (225 pp)	
A-386	2004-2005	DOF – Head of the Hylebos Waterway – 2004 Remedial Action – Weekly Progress Meeting Reports and Agendas	
A-387	2004-2005	DOF – Monthly Progress Reports and Agendas 2004 Construction Season	
A-388	7/21/06	Draft Remedial Action Construction Report	
A-389	Compiled 12/27/05	DOF Barge Loading Logs (339 pp)	
A-390	Compiled 12/27/05	DOF First Pass Final Cut Worksheets (128 pp)	
A-391	7/2006	DOF As-Built Drawings – Head of the Hylebos Waterway	
A-392	01/18/00	Memorandum re Comments of the Wood Debris Group on the Draft Explanation of Significant Differences	ARC0057836- 57850
A-393	02/02/00	Memorandum to Partnership for a Clean Waterway re Draft Explanation of Significant Differences	ARC0057035- 57080
A-394	5/19/03	Transportation and Disposal Services Agreement	HHCG00116048
A-395	8/1/06	E-mail between attorneys requesting detailed schedules to support Ross work (Ross 11/15/06 Dep., Ex. 2)	Ross 11/15/06
A-396	08/10/06	Letter and attachments re Ross backup documents from request of /1/06 (Ross 11/15/06 Dep., Ex. 3)	Ross 11/15/06
A-397	01/28/02	Letter to Ms. Cohen (USEPA) from HCC (Ross 11/15/06 Dep., Ex.4)	GM00012866-879

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-398	No date	Consulting Services Agreement between PCW and DOF, (Ross 11/15/06 Dep., Ex. 5)	GM000103893-96
A-399	4/6/00	Proposal from Striplin to PCW for sediment quality data (Ross 11/15/06 Dep., Ex. 6)	GM00010887-90
A-400	12/22/04	Letter to Mr. Cusma from Dr. Wolf (Ross 11/15/06 Dep., Ex. 7)	GMC0029485-29494
A-401	No date	Arkema invoice, (Ross 11/15/06 Dep., Ex. 8)	ARC 50000352
A-402	No date	Cost summary – May 2004 Budget Estimate v Projected Actual, (Ross 11/15/06 Dep., Ex. 9)	GM00015906
A-403	02/12/98	Invoices with redactions (Ross 11/15/06 Dep., Ex. 10)	Ross 11/15/06
A-404	11/15/06	Ross' Adjusted Investigation and Remediation Costs Calculation (Ross 11/15/06 Dep., Ex. 13)	Ross 11/15/06
A-405	No date	CERCLA definition of hazardous substance (Michelsen 11/10/06 Dep., Ex. 20)	Michelsen 11/10/06
A-406	No date	CERCLA definition of additional hazardous substances. Michelsen 11/10/06 Dep., Ex. 21)	Michelsen 11/10/06
A-407	No date	Title 40, Chap 1, Part 302: Designation of hazardous substances (Michelsen 11/10/06 Dep., Ex. 22)	Michelsen 11/10/06
A-408	No date	Excerpt (5.3.) from the Cleanup Study Report (Michelsen 11/10/06 Dep., Ex. 25)	Michelsen 11/10/06
A-409	No date	Excerpt (7.0) from the Cleanup Study Report (Michelsen 11/10/06 Dep., Ex. 26)	Michelsen Dep. 11/10/06
A-410	No date	Figure 5.6 from the Cleanup Study Report (Michelsen 11/10/06 Dep., Ex. 27)	Michelsen Dep. 11/10/06
A-411	06/30/06	Letter to Schmeil (Michelsen 11/10/06 Dep., Ex. 30)	ARC0093239-93249
A-412	No date	Figure 4.3 of the Cleanup Study Report (Michelsen 11/10/06 Dep., Ex. 33)	Michelsen Dep. 11/10/06
A-413	07/21/06	Photographs of Upland-Based Excavation and Backfill (Cusma 10/17/06 Dep., Ex 11)	Cusma Dep. 10/17/06
A-414	12/22/04	Letter to Cusma from Wolf (Cusma 10/17/06 Dep., Ex. 12)	GMC0029485-29486

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-415	12/19/05	Letter to Loutzenhiser from Zelenka (Cusma 10/17/06 Dep., Ex. 13)	GM00035404-35405
A-416	05/25/89	Letter to Stoner (EPA) from Blount	WEY00034824-35353; EPA00084-613
A-417	4/7/93	Letter to Oline from DOE	Cusma 12/1/06 Dep Ex. 2
A-418	Undated	Google Map of the General Metals facility	Cusma 12/1/06 Dep Ex. 3
A-419	8/1/80	Agreement between General Metals and Brad Oline	Cusma 12/1/06 Dep. Ex. 4
A-420	4/20/93	Acknowledgment and Release by Don Oline of General Metals	Cusma 12/1/06 Dep Ex. 5
A-421	2/4/93	Letter to Oline from DOE re; Auto fluff on property	Cusma 12/1/06 Dep. Ex. 6
A-422	7/31/78	Letter to Oline from DOE re NOV	Cusma 12/1/06 Dep. Ex. 7
A-423	07/00/06	Aerial photograph entitled As-Built Drawings HOH 2003-2006 Remedial Action (Hohenshild 10/16/06 Dep., Ex 1)	Hohenshild 10/16/06 Dep. Ex. 1
A-424	06/00/67	Figure 5-7 to Shields Rpt with Hohenshild handwritten notations,	EX003518 Hohenshild 10/16/06 Dep Ex. 3
A-425	07/13/06	Map of General Metals (Figure 5-9 to Shields 7/13/06 Expert Rpt) – Handwritten notation of witness	Hohenshild 10/16/06 Dep Ex. 5
A-426	07/18/88	Extracts from Preliminary Remedial Investigation by Sweet-Edwards/Emcon (Hohenshild 10/16/06 Dep., Ex. 7)	Hohenshild Dep. 10/16/06
A-427	01/00/06	Attachment 7 to DOE Consent Decree, GMC0000117-225 (Hohenshild 10/16/06 Dep., Ex. 9)	GMC0000117-225;
A-428	10/16/06	Sequence of events/notes brought by Mr. Hohenshild to deposition (Hohenshild 10/16/06 Dep., Ex. 10)	Hohenshild 10/16/06 Dep. Ex 10

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-429	10/20/05	McLean's handwritten notations on Figure 5-16: Facility map of the TEF	McLean 10/20/06 Dep. Ex. 1
A-430	07/08/98	Letter TEF from Lynn Gooding (DOE) Re: Petroleum Contamination at Tacoma Sort Yard and attached documentation (McLean 10/20/06, Dep Ex 4)	WEY0008625- 8639
A-431	04/1999	Spill Prevention Control and Countermeasures Plan WEY Company TEF and Sort Year (McLean 10/20/06, Dep Ex 5)	WEY0028623- 28645
A-432	11/06/92	Letter to Hiltner (EPA) from John Gross (WEY) Re: Commencement Bay Nearshore/Tideflats Superfund Site and attached documentation (McLean 10/20/06, Dep Ex 7)	WEY00001459- 1463
A-433	04/06/99	Extract from Shenk Associates Draft Final OMMP (McLean 10/20/06, Dep Ex 8)	FS0007063-7064
A-434	10/09/06	Historic Log Raft Coverage aerials (McLean 10/20/06 Dep Ex 10)	McLean
A-435	07/09/92	Notes on DOE SWR File Review	WEY0001445
A-436	11/30/89	Notice and Order of Civil Penalty from the Puget Sound Air Pollution Control Agency (McLean 10/20/06, Dep Ex 15)	WEY0003028
A-437	10/09/73	Handwritten Notes Re: Call to Dave Judkins/WEY (McLean 10/20/06, Dep Ex 16)	McLean 10/20/06 Depo
A-438	10/20/06	Handwritten Notes of McLean (McLean 10/20/06, Dep Ex 17)	WEY0003048
A-439	10/16/95	Letter to Dick McLean (WEY) from Dave Smith (DOE), 1 page (McLean 10/20/06, Dep Ex 18)	WEY0008653
A-440	12/06/05	Memorandum to Pittman from Seifert re: Weyerhaeuser Litigation Hold (Seifert 11/29/06 Dep., Ex. 2)	Seifert 11/29/06
A-441	11/29/06	TEF Asset List (Seifert 11/29/06 Dep., Ex. 4)	Seifert 11/29/06
A-442	03/08/93	(Amended) Weyerhaeuser Response to CERCLA 104(e) Request for Clarification (with cover letter dated 5/8/93)	Sinclair 11/28/06 Dep. Ex. 4
A-443	09/17/92	UBAT Inspection Summary	WEY0001386- 1387; Sinclair 11/28/06

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
			Dep. Ex. 10
A-444	01/09/03	Affidavit of Frederick Wolf, Ph.D.	ARC0020665- 20667
A-445	No date	Diagram of Dunlap property	ARC0108181
A-446	03/00/03	Diagram of Dunlap log haul-out	ARK010186 Wolf 10/11/06 Dep. Ex. 4
A-447	10/04/91	Extracts from Report to the Department of Ecology	ARC0104369-379; ARC0104530-533
A-448	09/16/92	Dunlap Towing Remediation Appropriation Request	ARC0012649-669
A-449	09/16/96	Memo forwarding 7/19/96 letter re due diligence issues	ARC0059531-533
A-450	03/09/89	Letter to Wolf re index of files reviewed at DOE	ARC0045809-814
A-451	No date	Arkema, Inc. adjusted invoice for use by the Hylebos remediation cleanup group for 2003-2006	ARC 50000352
A-452	00/00/04	Invoice Journal 2004 for Arkema	Wolf 10/11/06 Dep. Ex. 14
A-453	No date	Handwritten notes brought by Mr. Wolf to the deposition	Wolf 10/11/06 Dep. Ex. 15
A-454	04/09/96	SECOR Final Report submitted to Heller Ehrman	Wolf 12/01/06 Dep. Ex. 1
A-455	08/00/01	Draft report prepared for ENSR by ITR (Wolf 12/01/06 Dep., Ex. 2)	HRO0000023-70
A-456	01/09/74	Various Documents relating to allegations that Weyerhaeuser may have subleased Dunlap yard	ARC0109389-396; ARC0109406-411;
A-457	06/30/89	Letter to EPA from Pennwalt re Pennwalt's response to 4/24/89 letter	ARC0035610— 631
A-458	09/04/90	Memo to Mr. Fell from Mr. Hodges re Dunlop Property Remedy	ARC0016242-265
A-459	11/19/91	Letter/attachment to Leslie Nellermeoe from Bradley Marten re Potentially Liable Persons at 3009 Taylor Way Site	ARC0103669-673
A-460	12/00/91	Final Cleanup Action Plan for 3009 Taylor Way Site	ARC0061343-361
A-461	No date	PowerPoint presentation, "Lessons from Commencement Bay"	ARK008070-8083
A-462	No date	PowerPoint presentation "Allocating Remediation Liability"	ARK007842-49;

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-463	Various Dates	Dunlap Yard leases and sub-leases (will list individually)	ARC010810-447
A-464	5/10/05	Settlement Agreement and Release of Claims for Hylebos Waterway Response Costs and Remedial Action Costs Signed Around	GME00027723-728
A-465	6/20/05	Settlement Agreement and Release of Claims for Hylebos Waterway Response Costs and Remedial Action Costs Signed Around	GME00027729-734
A-466	9/29/05	Settlement Agreement and Release Signed Around	GME00026541-56
A-467	9/29/05	Settlement Agreement and Release of Claims for Hylebos Waterway Response Costs and Remedial Action Costs Signed Around Incomplete	GME00033812-817
A-468	9/29/05	Settlement Agreement and Release of Claims for Hylebos Waterway Response Costs and Remedial Action Costs Signed Around	GME00027717-722
A-469	01/17/92	Elf Atochem Commencement Bay Issue Paper (Wolf)	ARC0015942-66
A-470	09/18/97	EPA response letter re: requests made by HCC for reevaluation on oversight bill (Hiltner)	GMC0023847-57
A-471	12/28/00	EPA Special Notice Letter to GM for RD/RA re: Waterway problems at CB/NT (Pirzadeh)	GMC0026681-88
A-472	11/03/00	Hylebos Cleanup Committee response letter re: Informal Dispute Resolution HCC Dispute of EPA Oversight Invoice (Preston)	ARC0068870-74
A-473	01/22/01	Hylebos Cleanup Committee Statement of Position re: oversight cost dispute (Preston)	GME00001706-19
A-474	02/00/90	Atochem formerly Pennwalt Chemical Corp. Results of Sampling and Analysis of Processed Wood Material from the Expedited Response Action at the 3009 Taylor Way Site (ENSR)	WDOE-A_0009904-918
A-475	03/07/02	EPA response to letter dated 02/27/02 Michelle Pirzadeh re: Waterway cleanup (Iani)	GMC0026927-29
A-476	02/27/03	Atofina/GM response Letter to EPA/Iani re: dredging schedule (Schwartzberg/Zelenka)	GMC0027412-35
A-477	12/17/02	Meeting with Head of Hylebos Cleanup Group re: EPA should issue Kaiser §106 Order to participate	GM00010705

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-478	12/07/01	EPA response letter to Myers and Parkinson re: Mixed funding request for Waterway remedial action (Houck-Cora)	GMC0026698-704
A-479	02/12/02	Voluntary Petition (for Chapter 11 Reorganization) <i>by Kaiser Aluminum Corporation</i> (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 1)	
A-480	01/30/03	Stipulation and Agreed Order Regarding Filing of Environmental Claims by the United States (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 1693)	
A-481	08/22/03	Notice of Lodging of Proposed Consent Decree <i>by the United States</i> (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2790)	
A-482	08/22/03	Motion of Debtors and Debtors in Possession for Approval of Consent Decree Settling Environmental Claims of the United States, The States of California, Rhode Island and Washington and The Puyallup Tribe of Indians (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2791)	
A-483	08/00/03	Consent Decree (Final, signed by parties) (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Attachment 1 to Doc. No. 2790)	
A-484	09/08/03	Objection of Atofina Chemicals, Inc. to Motion of Debtors and Debtors in Possession for Approval of a Consent Decree Settling Environmental Claims of the United States, The States of California, Rhode Island and Washington and the Puyallup Tribe of Indians (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2866)	
A-485	09/08/03	General Metals of Tacoma's Objection to Kaiser's Request for Approval of Consent Decree Settling Certain Environmental Claims (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2871)	
A-486	09/08/03	Response of General Metals of Tacoma to Debtors' Omnibus Objection to Claims (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2872)	
A-487	10/10/03	Withdrawal of Objection of Atofina Chemicals, Inc. to Motion of Debtors and Debtors in Possession for Approval of a Consent Decree Settling Environmental Claims of the United States, The States of California, Rhode Island and Washington and the Puyallup Tribe of Indians (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2996)	

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-488	10/10/03	Withdrawal of Objection of General Metals of Tacoma to Kaiser's Request for Approval of a Consent Decree Settling Certain Environmental Claims (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 2995)	
A-489	10/17/03	United States' Joinder in Debtors' Motion to Approve Consent Decree and Memorandum of Law in Support Thereof (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 3034)	
A-490	10/27/03	Order Approving Consent Decree Settling Environmental Claims of the United States, the States of California, Rhode Island and Washington and The Puyallup Tribe of Indians (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 3102)	
A-491	02/06/06	Order Confirming the Second Amended Joint Plan of Reorganization of Kaiser Aluminum Corporation, Kaiser Aluminum & Chemical Corporation and Certain of Their Debtor Affiliates, as Modified (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 8225)	
A-492	02/06/06	Findings of Fact and Conclusions of Law Regarding Confirmation of the Second Amended Joint Plan of Reorganization of Kaiser Aluminum Corporation, Kaiser Aluminum & Chemical Corporation and Certain of Their Debtor Affiliates, As Modified by the Honorable Judith K. Fitzgerald (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 8226)	
A-493	03/29/07	Final Order <i>Affirming the Bankruptcy Court's March 6, 2006 Order Confirming the Second Amended Joint Plan of Reorganization</i> (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 9568; D. Delaware Case No. 06-247-JJF)	
A-494	03/29/07	Memorandum Opinion <i>Affirming the Bankruptcy Court's March 6, 2006 Order Confirming the Second Amended Joint Plan of Reorganization</i> (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 9567; D. Delaware Case No. 06-247-JJF)	
A-495	04/02/07	Errata Order <i>Correcting Final Order to Change Date of Bankruptcy Court's Order to March 7, 2006</i> (In re: Kaiser Aluminum Corporation, Case No. 02-10429-JKF; Doc. No. 9569; D. Delaware Case No. 06-247-JJF)	
A-496		Additional documentation of Kaiser – Plaintiffs' – EPA settlement or payments	

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-497		Kaiser historical pond dredging documents	
A-498	00/00/00	SonTek ADP Acoustic Doppler Profiler Performance Specifications	
A-499	00/00/00	S4 Current Meter Family Engineering Data & Specifications	
A-500	00/00/00	1500 kHz Sontek ADP standard deviation (accuracy) vs. averaging interval	
A-501	00/00/91	The use of defensible analytical chemical measurements for oil spill natural resource damage assessments. pp. 363-369. In: proc. Of the 1991 International Oil Spill Conference, American Petroleum Institute, Washington, DC. (Sauer, et al.) (Reference to Boehm 7/14/06 Expert Report)	Boehm Reference
A-502	00/00/06	Advances in Forensic Techniques for Petroleum Hydrocarbons: The <i>Exxon Valdez</i> Experience, Chapter 15, In Z. Wang and S. Stout eds., Petroleum Forensics, Elsevier (in press) (Bence, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-503	00/00/05	Polycyclic Aromatic Hydrocarbons, Chapter 15, pp. 313-337, In, R. Morrison and B. Murphy eds., Environmental Forensics – A Contaminant Specific Approach, Elsevier. (Boehm) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-504	00/00/05	Aspects of polycyclic aromatic hydrocarbons in offshore sediments in the Azeri sector of the Caspian Sea. In Armsworthy, S.L., P.J, Cranford and K. Lee [EDS]. Offshore Oil and Gas Environmental Effects Monitoring: Approaches and Technologies. Battelle Press, Columbia, Ohio. 631 pp. (Boehm, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-505	00/00/03	Identifying PAH from Manufactured Gas Plant Sites, Technical Report No. 1005289, EPRI, Palo Alto, CA. (Emsbo-Mattingly, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-506	00/00/01	Polycyclic aromatic hydrocarbon (PAH) chemistry of MGP tar and source identification in sediment. pp. 1-1 to 1-41. In: Sediments Guidance Compendium. Report No. 1005216. Electric Power Research Institute, Palo Alto, CA. (Emsbo-Mattingly, et al.) (Boehm 7/14/06 Rpt, Ex 2; Dalton 1/19/07 Rpt)	Boehm Reference
A-507	00/00/01	Recognition of and allocation among sources of PAH in	Boehm Reference

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		urban sediments. Env. Claims J. 13(4): 141-158. (Stout, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	
A-508	00/00/01	A guide to Polycyclic Aromatic Hydrocarbons for the Non-Specialist, Publication Number 4714, American Petroleum Institute, Washington, D.C., 32 pp. (Boehm, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-509	00/00/97	Application of petroleum hydrocarbon chemical fingerprinting and allocation techniques after the <i>Exxon Valdez</i> oil spill. Mar. Pollut. Bull. 34:599-613. (Boehm, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-510	00/00/95	Advanced chemical fingerprinting for oil spill identification and natural resource damage assessments. Pp. 967-969. In: Proc. 1995 Oil Spill Conference. API, Washington, DC. (Boehm, et al.) (Exhibit 2 to Boehm 7/14/06 Expert Report)	Boehm Reference
A-511	00/00/84	Aspects of the polycyclic aromatic hydrocarbon geochemistry of recent sediments in the Georges Bank region. Environ. Sci. Technol. 18:840-845. (Boehm, et al) (Reference Boehm 08/31/06 Rpt)	Boehm Reference
A-512	2000	Urban Sprawl Leaves Its PAH Signature (Van Metre)	Boehm Reference
A-513	2007	Sorption characteristics of Polycyclic Aromatic Hydrocarbons in Aluminum Smelter Residues (Breedveld)	Boehm Reference
A-514		Consent Decree, U.S. v. Anderson, et al.	
A-515		A Review of the Formation, Environmental Fate, and Forensic Methods for PAHs from Aluminum Smelting Processes	Boehm Reference
A-516	09/24/85	September 24-26, 1985. Source Test Report 85-14, Kaiser Aluminum and Chemical Corporation Potline #4 Emissions of Organic Aromatic Compounds. (WA State Depart. of Ecology)	WEY0026192- 26210 Boehm Reference
A-517		Composite photo showing sampling under Weyerhaeuser Dock (Boehm)	
A-518	00/00/01	Addendum Report: Continuation of the Sooke Bay Creosote Evaluation Study. Year Four: Day 1360 and Day 1540. Regional Program Report PR00-03. Prepared for Creosote Evaluation Steering Committee. May 74pp. (Goyette, et al)	Boehm Reference
A-519	12/19/94	Striplin Environmental Associates, Inc. 1994. Technical	

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
		Memorandum for Events 1A and 1B Data - Hylebos Waterway Pre-Remedial Design Program.	
A-520	6/7/94	Striplin Environmental Associates, Inc. et al. 1996. Hylebos Waterway Pre-Remedial Design Program - Technical Memorandum for Event 1C Phase I and Phase II Data.	
A-521	1994-1998	Striplin Environmental Associates, Inc. 1994-98. Selected sediment profile images from the Hylebos Waterway Round 1 and 2 investigations. (28 October 1998 transmittal by SEA to Floyd and Snider, Inc.)	
A-522		Lumber and Wood Products Employment Security Department Labor Market & Economic Analysis Branch www.wa.gov.esd.lmea/sprepts/indprof/lumber.htm#lumber	
A-523		Any and all exhibits listed by Plaintiffs not objected to by Weyerhaeuser	
A-524		Any documents not yet exchanged between parties and not objected to by Weyerhaeuser	
A-525		Any documents needed to address Farlow and Ross 4/16/07 supplemental reports received 4/17/07	
A-526	11/08/99	Hylebos Waterway Pre-Remedial Design Program Commencement Bay Nearshore/Tideflats Superfund Site: Pre-Remedial Design Evaluation Report (Hylebos Cleanup Committee)	Reference Floyd 7/14/06 Rpt
A-527	10/29/99	PSDDA Full characterization for the Hylebos Wood Debris Group. Letter to David Kendall (Pentec Environmental)	FS0018647- 0018678
A-528	01/11/95	Summary of Existing Information for the Commencement Bay Nearshore/Tideflats Superfund Site-Hylebos Waterway Pre-Remedial Design Program (Striplin Environmental Associates, Inc.)	Reference Floyd 7/14/06 Rpt
A-529	06/03/96	Hylebos Waterway Pre-Remedial Design Program Event 1A and 1B Data Report (Striplin)	Reference Floyd 7/14/06 Rpt
A-530	05/19/97	Hylebos Waterway Pre-Remedial Design Program Round 1 Data Report (Striplin)	Reference Floyd 7/14/06 Rpt

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-531	12/11/98	Hylebos Waterway Pre-Remedial Design Program Event Round 2 Data Report (Striplin)	Reference Floyd 7/14/06 Rpt
A-532	09/13/04	RD/RA Consent Decree, Head of the Hylebos Waterway Problem Area (US Dept. of Justice)	Reference Floyd 7/14/06 Rpt
A-533	09/00/89	Commencement Bay Nearshore/Tideflats Record of Decision, Region 10 (USEPA)	EPA01494-01976
A-534	08/00/00	Explanation of Significant Differences, Commencement Bay Nearshore/Tideflats Superfund Site (USEPA)	Reference Floyd 7/14/06 Rpt
A-535	07/21/06	Agency Review Draft Remedial Action Construction Report, Part 1 (Dalton, Olmsted and Fuglevand)	Reference Floyd 9/01/06 Rpt
A-536	05/09/97	Review of the Significance of Log Handling and Wood Debris in the Marine Environment (Pentec Environmental, Inc.)	FS0018230- 0018266
A-537	06/10/99	Work Plan Kaiser Ditch and Nearshore Investigation (WEY0010361-10401) Ex 4 to Boehm 10/17/06 Dep.	WEY0010361- 10401
A-538	07/06/92	Letter to Paul Skyllingstand from Paul Schmeil Re: Kaiser Ditch Cleanup Project Confirmation Sampling Report. (Kaiser)	WEY0020326
A-539	07/02/92	Kaiser Ditch Cleanup Project, Confirmation Sampling Report, Kaiser Aluminum, Tacoma, WA. Page 1-3, Appendix A, Appendix B. (Landau)	WEY0016125- 06036
A-540	12/17/90	Construction Certification Sludge Cleanup Project, Kaiser Aluminum & Chemical Corporation Tacoma, WA. (Landau)	Reference Recker 7/14/06 Rpt
A-541	4/99	Hylebos Wood Debris Program Operation, Maintenance & Monitoring Plan (OMMP)	FS0007056-7228
A-542	08/16/06	All references, tables and figures from Brian Bornhold's Expert Report	EX003728-66
A-543	10/31/06	All references, tables and figures from Brian Bornhold's Rebuttal Report	BORN00000 621-641

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-544	02/02/07	All references, tables and figures from Brian Bornhold's Revised Expert Report	EX004356-4511
A-545	07/13/06	All references, tables and figures from Matthew G. Dalton's Expert Report	EX003867-3964
A-546	08/10/06	All references, tables and figures from Daltons' Rebuttal Report	EX003965-3969
A-547	1/19/07	All references, tables and figures from Dalton's Supplemental Rebuttal Report	EX004272-4323
A-548	07/14/06	All references, tables and figures from Raleigh Farlow Expert Rpt	EX000001-133
A-549	08/30/06	All references, tables and figures from Raleigh Farlow Rebuttal Rpt	EX000134-155
A-550	01/26/07	All references, tables and figures from Farlow Rebuttal of Supplemental Rpt	EX004324-435
A-551	4/16/07	All references, tables and figures from Supplemental Opinion of Raleigh Farlow re Phenolic Compounds	EX006289-6485
A-552	07/14/06	Opinions of Paul F. Fuglevand, P.E., All references, tables and figures from Fuglevand 7/14/06 Expert Report	EX003982-4070
A-553	08/31/06	All references, tables and figures from Fuglevand 8/31/06 Rebuttal Opinions	EX003970-3981
A-554	11/27/06	All references, tables and figures from Fuglevand 11/27/06 Supplemental Expert Report	EX004512-4562
A-555	08/24/06	DOF Dredged Material Sampling Report, Head of Hylebos Waterway Problem Area, including attached wood debris sample logs	
A-556	3/19/04	DOF Revised Final (100%) Design Deliverable for 2004 Work and Basis for Design Report	
A-557	1993	Administrative Order on Consent for Pre-Remedial Design Study	ARC0107304
A-558	07/14/06	All references, tables and figures from Ross' 7/14/06 Expert Report	EX003000-3018

Arkema, Inc., et al. v. Asarco, Inc., et al.

No. C05-5087 RBL

DEFENDANT WEYERHAEUSER COMPANY'S EXHIBIT LIST

Filed April 23, 2007

	DATE	DESCRIPTION	BATES/ REFERENCE
A-559	4/16/07	All references, tables and figures from Ross' 4/16/07 Expert Report	
A-560	07/12/06	All references, tables and figures of Teresa Michelsen, Ph.D.	EX004088-4113
A-561	09/22/93	Storm Water Pollution Prevention Plan for Tacoma Export Facility	WEY0016092-16124
A-562	11/01/90	UBAT Inspection Summary for Weyerhaeuser Log Sort Yard	WEY0001388-1394
A-563	11/00/04	Wood Debris Volumes in the Hylebos Waterway Rpt. (Floyd)	WEY0001129-76
A-564	03/19/04	Final 100% Design Deliverable for Work & Basis for Design Report (Dalton, Olmsted & Fuglevand, Inc.)	Reference Floyd 7/14/06 Rpt
A-565	00/00/04	2004 Remedial Action Work Plan (2004 RA Work Plan) (Dalton, Olmsted & Fuglevand, Inc.)	Reference Floyd 7/14/06 Rpt
A-566	06/00/00	Hylebos Waterway Wood Debris Program Cleanup Study Report, 3 Volumes (Floyd & Snider)	Reference Floyd 7/14/06 Rpt
A-567	10/00/00	Hylebos Waterway Wood Debris Program Cleanup Action Plan (Floyd & Snider)	FS012779-12837